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| BENJAMIN, A. | | |
| BERMAN, H.S. | | |
| BRANCH, D.B. | | |
| BURLINGAME, A.H. | | |
| CARNIVAL, G.J. | | |
| COPP, R.D. | | |
| CROUCHER, D.W. | | |
| DAVIS, J.G. | | |
| EVERED, J.E. | | |
| FERRERA, D.W. | | |
| GOODWIN, R. | | |
| HANNI, B.J. | | |
| HEALY, T.J. | | |
| HILBIG, J.G. | | |
| IDEKER, E.H. | | |
| KERSH, J.M. | | |
| KIRBY, W.A. | | |
| KRIEG, D. | | |
| KUESTER, A.W. | | |
| LEE, E.M. | | |
| MAJESTIC, J.R. | | |
| MARX, G.E. | | |
| MORGAN, R.V. | | |
| PIZZUTO, V.M. | | |
| POTTER, G.L. | | |
| SANDLIN, N.B. | | |
| SHEPLER, R.L. | | |
| SULLIVAN, M.T. | | |
| SWANSON, E.R. | | |
| TALLMAN, K.G. | | |
| WIEBE, J.S. | | |
| WILSON, R.B. | | |
| WILSON, J.M. | | |
| YOUNG, E.R. | | |
| ZANE, J.O. | | |
| <i>silva, R.</i> | <i>X</i> | |
| <i>chubut, A.</i> | <i>X</i> | |
| <i>ablen, J.</i> | <i>X</i> | |
| <i>ROSS, J.</i> | <i>X</i> | |

DEBES CONTROL
SAFE

Reviewed for Addressee
Corres. Control RFP

-1592 *Ca*

DATE BY

Department of Energy

ROCKY FLATS OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

MAY 13 1 52 PM '92

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ATTACHMENT III
JRC-039-93
1 of 2

MAY 14 1992

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

92-DOE-4680

RECEIVED MAY 27 1992

Frederick R. Dowsett, Ph.D., Unit Leader
Hazardous Materials and Waste
Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Dr. Dowsett:

This letter provides additional information on the recharacterization of the laundry waste water that originates in Building 778. This subject was discussed with your staff several times in February and March 1992. This letter also provides an update on Resource Conservation and Recovery Act (RCRA) Contingency Implementation Report No. 91-030. The original hazardous waste determination of laundry waste water has been revised in accordance with the Colorado Code of Regulations (6 CCR 1007-3).

On November 28, 1986, the Rocky Flats Plant (RFP) applied for interim status for a number of hazardous waste treatment and storage sites at the plant. At that time Laundry Waste Water was characterized as RCRA regulated hazardous waste. Analysis of this waste stream has historically shown evidence of organic solvents (up to 700 ppb). It is believed that these traces of solvents appear as a result of incidental contact with clothing during degreasing, machining, painting, and other routine operations taking place at the plant. As part of the current waste minimization program practiced at RFP, the vast majority of the regulated solvent use has been eliminated. However, recent analysis of the waste stream (conducted during the shut-down period) has revealed the presence of solvents at approximately 40 ppb. Past interpretations of the mixture rule have led plant operators to manage the waste stream as a hazardous waste. Since there are no concentration-based standards for this rule, this waste stream has been managed as F001 and F002 spent solvent waste.

We now believe those interpretations to be overly conservative and therefore inappropriate. Our current position is that this waste stream does not meet the definition of a RCRA regulated hazardous waste for the following reasons:

- The soiled laundry (coveralls, undergarments, and towels) is put back into use after laundering and therefore does not meet the definition of a solid waste. Thus, the laundry is not a hazardous waste when it enters the laundry process. Since the soiled laundry is not a hazardous waste, the mixture rule does not apply and the resulting waste water would only be hazardous if it exhibited a characteristic of a hazardous waste. Based on a recent analysis, this waste stream does not exhibit any of the four hazardous waste characteristics.

- Recent guidance issued by the U. S. Environmental Protection Agency states that the spent solvent listings apply only to wastes that are generated when the solvents are used for their solvent properties and can no longer be used or reused without reclamation. The spent solvent listing does not apply to waste streams that may become contaminated with solvents during processing or manufacturing. The laundry water is a process waste stream that has been contaminated with a solvent constituent, not a listed spent solvent. Therefore the mixture rule does not apply.


Based on this information and the subsequent hazardous waste determination, laundry waste water produced in Building 778 and collected in Building 732 will no longer be managed as a RCRA regulated hazardous waste. Action will be initiated to remove the Building 778 and 732 facilities from the RCRA Part B applications. The lint and debris generated during the laundry process also will not be managed as a hazardous waste. Additionally, similar waste streams expected to be generated in the new laundry (Building 566), when it is placed in service in the future, will be managed as non-RCRA regulated hazardous waste.

On October 24, 1991, the RCRA Contingency Plan was implemented in Building 732 which contains the tank that receives and stores laundry water from Building 778. The plan was implemented because inspection of the tank's secondary containment found cracks in the paint which serves as the impermeable barrier. As discussed above, at the time the contingency plan was implemented, it was thought that the laundry waste water was RCRA regulated. Contingency Implementation Report 91-030 was prepared and compensatory actions were adopted to allow continued use of the tank.

Since the waste water has subsequently been determined to be non-hazardous (as discussed above), and therefore it is not regulated, the corrective actions discussed in the implementation report will no longer be carried out. Consequently, no further reporting on the status of this contingency implementation report will be submitted, unless CDH requests additional information.

If you have any questions, please contact Tom Lukow at 966-4561 or Fred Gerdeman at 966-6203.

Sincerely,


James K. Hartman
Assistant Manager
for Environmental Management

cc:

T. E. Lukow, WMED, RFO
M. J. Roy, OCC, RFO
F. W. Gerdeman, WOB, RFO
D. L. Mauer, WOB, RFO
R. Craun, CED, RFO
R. M. Leitner, EG&G
A. L. Schubert, EG&G
J. R. Cable, EG&G
J. F. Ross, EG&G